

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED _____
	:	
ARSHAD ALI,	:	VIOLATIONS:
a/k/a “Hakeem Raheem,”	:	21 U.S.C. § 841(a)(1) (possession with
a/k/a “Kareem Adams”	:	intent to distribute cocaine base – 1
	:	count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute heroin – 1 count)
	:	18 U.S.C. § 924(c) (carrying a firearm
	:	during and in relation to a drug
	:	trafficking crime – 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon
	:	in possession of a firearm – 1 count)
	:	Notices of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 9, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”

knowingly and intentionally possessed with intent to distribute 50 grams or more, that is, approximately 60.5 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance
containing a detectable amount heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”**

knowingly used and carried a firearm, that is, a .40 caliber Smith and Wesson semi-automatic handgun, serial number PAZ 8993, loaded with ten live rounds of ammunition, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a .40 caliber Smith and Wesson semi-automatic handgun, serial number PAZ 8993, loaded with ten live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

**ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including, but not limited to:

- (i) .40 caliber Smith and Wesson semi-automatic handgun, serial number PAZ 8993; and
- (ii) the 10 live rounds of ammunition removed from the firearm described in Paragraph (i) above;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including, but not limited to, the sum of \$855.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

_____ As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

**ARSHAD ALI,
a/k/a “Hakeem Raheem,”
a/k/a “Kareem Adams,”**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

- (a) .40 caliber Smith and Wesson semi-automatic handgun, serial number PAZ 8993; and
- (b) the 10 live rounds of ammunition removed from the firearm described in Paragraph (a) above.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

_____ **A TRUE BILL:**

_____ **FOREPERSON**

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**